

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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Southern District of New York  
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December 13, 2021

*Via ECF*

The Honorable Edgardo Ramos  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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DATE FILED: 12/13/2021

**MEMO ENDORSED**

Re: *United States v. Pedro Nunez*, 21 CR 612 (ER)

Dear Judge Ramos:

With the government's consent, I write to seek a modification to the conditions of Mr. Nunez's release so that Mr. Nunez, who resides in Philadelphia, Pennsylvania, can spend one night in New York at his grandmother's house to facilitate a visit I have scheduled with him in my office. He is scheduled to meet with me in New York the afternoon of December 15, 2021. I expect that the meeting will last several hours. I ask that he be permitted to stay at his grandmother's house the night of our legal visit and return to Philadelphia the next day.

Mr. Nunez was presented on September 8, 2021 at which time Magistrate Judge Cave set bail conditions. Those conditions originally required that Mr. Nunez live in New York at his grandmother's house, but, upon my application, the Court modified the conditions so that Mr. Nunez could reside in Philadelphia, Pennsylvania. Mr. Nunez also is subject to house arrest. Mr. Nunez has been compliant with the conditions of his release.

Pretrial Services has a policy by which it prohibits defendants on house arrest from staying overnight at any residence other than their own and, accordingly, objects to the instant application. The government consents to the application.

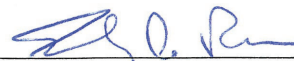
Respectfully submitted,

/s/ Julia Gatto

Julia L. Gatto, Esq.  
212.417.8750

cc: AUSA Kedar Bhatia (via ECF)

The application is X granted  
\_\_\_\_\_ denied



Edgardo Ramos, U.S.D.J.  
Dated: 12/13/2021  
New York, New York